## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

HOWARD COHAN	)		
Plaintiff,	)		
VS	)	Case No.:	18 CV 05680
RUSH ONTARIO, LLC, dba AC MARRIOTT CHICAGO DOWNTOWN.	)		
Defendant.	)		

## JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff, Howard Cohan ("Plaintiff") and Defendant, RUSH ONTARIO, LLC, dba AC MARRIOTT CHICAGO DOWNTOWN ("Defendant") ("Plaintiff and Defendant are collectively referred to as the Parties"), having entered into a Confidential Settlement Agreement and Release ("Agreement") that resolves all claims that were or could have been brought in this action, hereby stipulate to the dismissal of this action with prejudice. Attorney's fees and other recoverable costs and expenses, if any, shall be disbursed as specified by the Parties in their Agreement. The effectiveness of this Stipulation is conditioned upon the Court's entry of a Final Order dismissing this action with prejudice (the "Order"). The parties hereby stipulate and agree to the entry of the attached proposed Order and respectfully request that the Court enter the same.

[Remainder of page intentionally left blank]

Jointly submitted this 13<sup>th</sup> day of November, 2018.

Respectfully submitted,

## **ROBERT M. KAPLAN, P.C.**

Counsel for Plaintiff 1535 W. Schaumburg Rd., #204 Schaumburg, IL 60194-4052 Telephone (847) 895-9151 Facsimile: (847) 895-7320

By: <u>/s/ Robert M. Kaplan</u>
Robert M. Kaplan

rmkap@robertkaplanlaw.com

**JOSEPH F. SPITZZERI** 

Counsel for Defendant Johnson & Bell, Ltd. 33 W. Monroe Street, Ste. 2700 Telephone: (312) 372-0770

Facsimile: (312)

By: /s/ Joseph F. Spitzzeri Joseph F. Spitzzeri

spitzzerij@jbltd.com

ROBERT M. KAPLAN
LAW OFFICES OF ROBERT M. KAPLAN, P.C.
Attorney for Plaintiff
1535 W. Schaumburg Road, #204
Schaumburg, Illinois 60194
(847) 894-9151
IL Bar No. 6206215
rmkap@robertkaplanlaw.com

 $K: KAPLAN\C lients \LITIGATION\C OHAN\ FILES\C ohan H.18LIT1282.10. Marriott\ Chicago\Joint\ Stipulation\ of\ Dismissal.\ 11\ 13\ 18. docx$